

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
v.	:	S2 20 Cr. 330 (AJN)
	:	
GHISLAINE MAXWELL,	:	<b>NOTICE OF MOTION</b>
	:	
Defendant.	:	
	:	
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**GHISLAINE MAXWELL’S MOTION UNDER FEDERAL RULE OF EVIDENCE 412  
TO PERMIT QUESTIONING ABOUT HER ACCUSERS’ SEXUAL BEHAVIOR**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Defendant Ghislaine Maxwell, through counsel, hereby moves under Federal Rule of Evidence 412 and the constitutional rights to present a defense and to confrontation to permit questioning regarding her accusers’ other sexual behavior.

Dated: October 27, 2021  
New York, New York

Respectfully submitted,

*s/ Jeffrey S. Pagliuca*

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